

EXHIBIT Q



COMMISSION ON HUMAN RIGHTS

40 RECTOR STREET, NEW YORK, NY 10006

Dial 311 www.nyc.gov/cchr

PATRICIA L. GATLING

Commissioner and Chair

11-30-04

NOTICE OF FILING OF DISCRIMINATION COMPLAINT

PLEASE TAKE NOTICE that a complaint has been filed with the New York City Commission on Human Rights charging you with violation of the New York City Human Rights Law. **A COPY OF THE COMPLAINT IS ENCLOSED.**

You are required to file a verified answer to the complaint within 30 days after having been served. Failure to file an answer could result in a default and the loss of your right to present evidence at a hearing. Affirmative defenses must be stated in your answer. Further information about the requirements for answers is found in Section 8-111 and 8-119(c) of the New York City Human Rights Law. Requests for adjournment of the time to answer a complaint must be directed to the Managing Attorney of the Law Enforcement Bureau.

Although the New York City Human Rights Law does not require respondents to submit a position statement in addition to a formal answer, the Law Enforcement Bureau encourages all respondents to do so. A position statement is a detailed narrative response to the allegations; it should include any documentation in support of your answer.

ANSWERS SHOULD BE MAILED TO:

New York City Commission on Human Rights
Law Enforcement Bureau
40 Rector Street – 9th Floor
New York, New York 10006

CITY OF NEW YORK
COMMISSION ON HUMAN RIGHTS

Complaint No:
M-E-PS-5-1016444-

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In the Matter of the Complaint of

MICHELLE LEVY SCHULZ,

Complainant,

Verified Complaint

- against -

J.C.DENIRO & ASSOCIATES L.L.C., CHRISTOPHER
MATHIESON,

Respondent

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Michelle Levy Schulz, complaining of respondent(s), alleges as follows:

1. Complainant Michelle Levy Schulz is a heterosexual woman and opposes discrimination. Her address is 929 Lorimer Street, #3L, Brooklyn, NY 11222.
2. Respondent J.C. DeNiro & Associates (Associates) is an employer as defined by Section 8-102 of the Administrative Code of the City of New York, and employs four people. Its address is 65-67 North Moore Street, Suite 2A, New York, NY 10013.
3. Respondent Christopher Mathieson is a co-owner and is employed by Respondent Associates as a general manager. His address is 174-A 9th Avenue, New York NY 10011.
4. On or about October 23, 2003, Respondent Associates hired Complainant as a licensed real estate sales person.
5. In or about December 2003, Complainant was alone with Respondent Mathieson when he made a joke about him being bi-sexual. Additionally, he reached across Complainant and brushed her upper thigh and quickly opened a drawer to offer her gum as if that was his primary intension. Complainant stood up and told Respondent Mathieson that she was uncomfortable. Respondent Mathieson did not address the touching issue.
6. In or about April 2004 and May 2004, Complainant was subjected to her co-workers and Respondent Mathieson's lewd and insidious jokes, pornographic movies, and being touched inappropriately by Respondent Mathieson. Complainant told the employees including Respondent Mathieson that she was uncomfortable with their behavior at work and that they should cease their inappropriate behavior. No remedial action was taken.
7. On or about May, 2004, Respondent Mathieson asked Complainant if his clothing were fitting properly because he did not have any underwear on. Complainant replied that was not a conversation he should share with her.

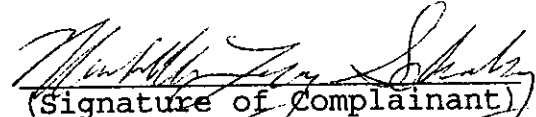
8. On or about May 11, 2004, Complainant, who had been ill, sent her husband to retrieve work that she could do at home. He overheard a disturbing conversation about pills and was concerned that his wife would become a victim. He told his wife that May 11, 2004 was to be her last day of work. Although reluctant Complainant planned to clean her work area on Friday May 14, 2004 and not return to work.

9. On or about May 14, 2004 Complainant went to work to retrieve her files and documentation. She was confronted by Respondent Mathieson who told her to grow up and give him the respect he deserved. He then pointed to his lower body and implied that Complainant should favor him with oral sex. She did not respond to him but she ran out of the building crying and went home.

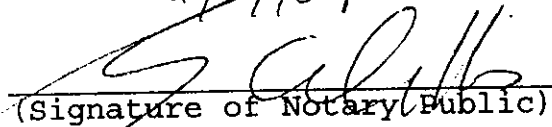
10. When Complainant reached home she had a message to call Respondent Mathieson. She returned the call, and he told her she was fired.

11. Complainant charges that Respondents have discriminated against her in the terms and conditions of her employment by subjecting her to a hostile work environment and terminating her employment because she is heterosexual and female, in violation of Section 8-107.1(a) of the Administrative Code of the City of New York and have damaged her thereby.

Michelle Levy Schulz, being duly sworn, deposes and says: that I am the complainant herein; I have read (or had read to me) the foregoing complaint and know the content thereof; that the same is true of my own knowledge except as to the matters therein stated on information and belief; and that as to those matters, I believe the same to be true.


(Signature of Complainant)
11-19-04

Subscribed and sworn to before me
this 11/19/04


(Signature of Notary Public)

Garfield R. Willis
Registration No: 02W16091418
Public Notary
State of New York, Bronx County
Commission Date 4/28/2007